

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Anthony Sherrard Wilson

Case: 2:21-mj-30092

Assigned To: Unassigned

Assign. Date : 2/24/2021

SEALED MATTER (kcm)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 14, 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 24, 2021City and state: Detroit, Michigan

*Complainant's signature*Special Agent Rohit Joshi, A.T.F.*Printed name and title*

*Judge's signature*Hon. Curtis Ivy, Jr., U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Rohit Joshi, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) since August 2016. I am currently assigned to the Detroit, Michigan Field Division, Group I. I am tasked with investigating violations of firearms and narcotics laws. I also have been involved in numerous investigations involving violations of federal firearms and narcotics laws. Prior to my employment with the ATF, I was employed by the Wayne State University Police Department, Detroit, Michigan, for approximately ten years as a Police Officer and Sergeant, which included six years as a Task Force Officer (“TFO”) with the Detroit Police Department’s Commercial Auto Theft Section/Carjacking Unit. During this employment, I investigated violations of State of Michigan laws relating to firearms, narcotics, carjacking, armed robbery, auto theft, insurance fraud, and motor vehicle title fraud. In addition, I have completed both the Criminal Investigator Training Program and Special Agent Basic Training at the Federal Law Enforcement Training Center, and I have completed the Michigan Law Enforcement Basic Training Academy. Through my training, education and experience, I have become familiar with the manner in which criminals operate their

clandestine activities, including drug and firearms traffickers. I also have investigated drug houses and how they operate. In addition, I have experience using undercover informants in narcotics and firearms trafficking investigations.

2. The facts contained in this affidavit are based on my review of information provided to me by and/or through other law enforcement agents, investigators, informants, witnesses and individuals with knowledge of this matter, as well as my investigation, and my review of documents. The information outlined below is provided for the limited purpose of obtaining the requested Criminal Complaint and does not contain all details or all facts of which I am aware relating to this investigation. This affidavit provides information necessary to establish probable cause Anthony Sherrard WILSON, (Date of Birth: XX-XX-1986), has violated Title 18, United State Code, Section 922(g)(1), possession of a firearm by a convicted felon.

II. SUMMARY OF THE INVESTIGATION

3. On December 14, 2020, Detroit Police Officers J. Patterson and T. Warner were on routine patrol, and went to Liquor Captain, located at 18077 Kelly Road, Detroit, Michigan. Officer Patterson observed a pistol grip of a handgun protruding from WILSON's right pocket as WILSON walked past him. In addition, Officer Patterson observed WILSON conduct a weapon retention check and an imprint of a handgun in WILSON's right pocket. Officer Patterson made contact

with WILSON and asked WILSON if he possesses a Michigan Concealed Carry Permit (CPL), and WILSON stated he is open carrying.

4. Officer Patterson then recovered the firearm, a Springfield, Model XD .45 caliber semi-automatic pistol with 14 ammunition rounds, from WILSON. Officer Patterson then instructed Officer Warner to place WILSON in handcuffs but WILSON raced out of the liquor store and began to flee on foot. Officers pursued WILSON on foot for several blocks. Officers followed WILSON northbound on Morang, from Kelly. The officers then followed WILSON as he turned westbound onto Mapleridge from Morang and northbound through a field until they eventually apprehended WILSON.

5. I reviewed a computerized criminal history of WILSON, which revealed a conviction for the following felony:

- a. September 2011: Felony-Bank Robbery-Sentenced to 46-months with the Federal Bureau of Prisons.

6. On February 22, 2021, I contacted ATF interstate nexus expert Special Agent (SA) Shannon Richardson. SA Richardson indicated based on the description provided, Springfield, Model XD .45 caliber semi-automatic pistol, was manufactured outside of the State of Michigan, and therefore had traveled in and affected interstate commerce.

III. CONCLUSION

7. Probable cause exists that Anthony Sherrard WILSON did knowingly and intentionally possess a firearm, to wit; One (1) Springfield, Model XD .45 caliber, semi-automatic pistol, said firearm having travelled in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1). This violation occurred within the Eastern District of Michigan.



Rohit Joshi
Special Agent, ATF

Sworn to before me and signed in my
Presence and/or by reliable electronic means



Hon. Curtis Ivy, Jr.
United States Magistrate Judge

DATE: February 24, 2021